

## REMARKS

The previous rejection of claims 2-22 under Section 112 is believed to be obviated in view of the correct spelling of "carrier elements".

The rejection of claims 1-4, 6-10 and 20-22 over Henington et al (EP 0959153) is respectfully traversed, particularly insofar as those claims are now amended.

Most specifically, the Examiner's attention is drawn to claim 1, as amended herein.

Henington et al does not disclose providing the apparatus 24 to carry or secure at least two conveying members which are all located on one side of the conveying path or to carry or secure at least one treatment device or to carry or secure an ensemble of at least one conveying member and at least one treatment device. Rather, Henington et al discloses holding an upper roller on one side of the conveyor path and a lower roller on the other side of the conveyor path, thereby having only one conveying member on each side of the conveying path.

Additionally, it is not seen that Henington et al has any disclosure of the conveying members and the treatment devices being carried or secured by the module systems, which in turn comprise the insertion elements and wherein the insertion elements are configured such that they are fitted into the recesses of the carrier elements. Rather, it is not seen that a treatment device of Henington et al is fastened into the treatment unit using module systems.

The treatment unit in accordance with the present invention provides a flexibility and permits the ready utilization of different transport systems without involving major expense and without having the carrier elements needing to be re-adapted each time a change has to be performed in the treatment unit. For example, if a group of conveying members is to be interchanged with another group of conveying members, such as, for example, if flexible material is to be treated after the treatment of rigid material, which might involve then using groups of two conveying members that will be interchanged by groups of four conveying members to secure the transport of flexible material, such interchange in accordance with the present invention can be performed quickly and at low expense and without requiring reconstruction. But the treatment unit of Henington et al would seem to necessarily require reconstruction in such situation by either the cutting of additional slots, or changing the sidewalls to accommodate different units, which would necessarily require significant delay in the manufacturing and additional expense.

Additionally, the present invention makes possible the interchange of a module that comprises groups of conveying members with the module that comprises a group of conveying members and a treatment device. It is not seen that Henington et al has any such capability.

Moreover, it is submitted that one of ordinary skill in this art would not be motivated to change the unit of Henington et al such that the modules of the present invention are used instead of the construction of the walls 124 of Henington et al, for example, as are shown in Figs. 7C and 7D.

It is additionally submitted that it would not be obvious that the holding and securing mode of the present invention could be adapted from Henington et al. Again, with reference to Figs. 7C and 7D of Henington et al the parts 100 and 112 of the apparatus 24 allow for a variation of thickness of the substrates that are to be plated (see paragraphs 36, 37 of Henington et al). Thus, it would be necessary for the rollers that are in direct contact with the substrate to accommodate the substrate. In Henington et al, the fluid delivery apparatus 16 and positioning apparatus 18 would not be moved vertically as the thickness of the substrate varies, because the treatment devices are placed at a distance from the substrate surface and the thickness variation is small for printed circuit boards. For example, for printed circuit boards the thickness variation may be only several millimeters, such that the treatment devices of Henington et al can be fixedly fastened in the treatment unit as does Henington et al.

It is submitted that it would not be obvious for one skilled in the art to use the apparatus 24 as shown for example in Figs. 7A and 7B to hold the treatment devices, and certainly there is no such disclosure to do so by using the module system of the invention.

In accordance with the present invention, by both holding and securing the conveying members and the treatment devices using the module systems of the invention, such allows a flexibility and thus allows easily changing the structure of an existing treatment unit, for example, by adapting the treatment quickly from one processing requirement to another, such as, for adapting the treatment unit from electroplating rigid boards to electroplating flexible boards, and vice versa, or to adapt the high speed plating to a high-aspect ratio plating that uses lower current density and vice versa, for example.

It is thus submitted that the present invention provides the ability to adapt the treatment units quickly, and makes changes not only possible, but efficiently so. Furthermore, as different processing requirements require different structures, each treatment unit in accordance with prior

art techniques would wind up being one of unique construction. However, using the present invention, all treatment units can be manufactured by using the same structural elements and simple mechanical insertions of conveying members and treatment devices where needed can be readily and efficiently done. This allows the use of standardized parts to make a treatment that can be put together as a modular construction system.

In view of the above, it is submitted that claim 1 should be clearly allowable.

New claims 23 and 24 are drafted along the lines of claim 1, but are presented in different formats, with claim 24 being somewhat broader. The arguments above with respect to the proper allowability of claim 1 apply equally as well to each of new claims 23 and 24.

All of the remaining claims either depend from or include the limitations that are addressed above with respect to claim 1, and are submitted to be properly allowable thereover, for the reasons addressed above, in addition to the specific subject matter that is added by the dependent claims.

With respect to the rejections of claim 5 over Henington et al and Pender, and of claims 11-19 over Henington et al in view of Haas et al, it is submitted that neither of those secondary references address any of the features discussed above with respect to the deficiencies of Henington et al and the improvements due to the features of claim 1 that are addressed above.

Accordingly, it is submitted that all of the claims of this application should be properly allowed.

An early indication of the same would be greatly appreciated.